

Response to FCC solicited comments: RM-10810  
From: T. Nick Hulbert KG5N

All radio amateur service communications skills either legacy or modern should be by fundamental definition recognized, enhanced, and encouraged from within the FCC in pursuit of the value, effectiveness, and skills of trained operators. As a parallel, a licensed motor vehicle operator is still required in most (if not all) states to understand and utilize when necessary the legacy hand signals common to a much earlier era. It is recognized by these states that high tech implementations to signaling a driver's intentions do fail or may be unavailable. In contrast, the public is better served with retaining some level of legacy (CW) radio amateur service expertise rather than totally eliminated due to the popularity of high tech replacements. The Amateur Extra Class licensing level appears to be the best suited for the retention of this expertise.

An all or nothing Morse code decision seems to be a position not in the best interest of the public. It serves no purpose for either side of the no code debate and ultimately denies the public options that may or may not otherwise be available. Recognition and enhancement of the value of the amateur radio service is key.

The Petitioner of RM-10810 offers a reasonable solution to the code/no-code debate. The petition offers a great deal of HF privilege to a single class license with no-code entry requirements yet retains the CW exam at a higher level than the existing element 1 exam to the Extra Class license. This adds value to the reservoir of "trained operators", and is not unreasonable to ask of this licensing level of amateur expertise. This one license class would act as the repository for preserving and maintaining CW; a human based operating skill, with no impact to the entry-level license. **I strongly support this concept as a viable solution that addresses and negotiates both code and no-code objectives within the amateur radio service.**